

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VICKEY RONGEY WILLARD, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

UP FINTECH HOLDING LIMITED,  
TIANHUA WU, JOHN FEI ZENG,  
YONGGANG LIU, LEI FANG,  
DAVID ERIC FRIEDLAND,  
VINCENT CHUN HUNG CHEUNG, BINSIN  
TANG, XIN FAN, JIAN LIU, XIAN WANG,  
CITIGROUP GLOBAL MARKETS INC.,  
DEUTSCHE BANK SECURITIES INC.,  
AMTD GLOBAL MARKETS LIMITED,  
CHINA MERCHANTS SECURITIES (HK)  
CO., LIMITED, and TOP CAPITAL  
PARTNERS LIMITED.

Defendants.

Case No. 1:19-cv-10326-JMF

**CLASS ACTION**

**NOTICE OF MOTION TO DISMISS THE AMENDED CLASS ACTION COMPLAINT  
ON BEHALF OF DEFENDANTS UP FINTECH HOLDING LIMITED,  
CITIGROUP GLOBAL MARKETS INC., AND DEUTSCHE BANK SECURITIES INC.**

PLEASE TAKE NOTICE that, upon the Amended Class Action Complaint, filed March 24, 2020 (ECF No. 32); the Memorandum of Law, dated May 8, 2020, submitted herewith; the Declaration of Michael B. Carlinsky, dated May 8, 2020, and exhibits thereto, submitted herewith; and upon all prior papers and proceedings herein, Defendants UP Fintech Holding Limited, Citigroup Global Markets Inc., and Deutsche Bank Securities Inc. will move this Court, before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time designated by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for an Order dismissing the

Amended Class Action Complaint in its entirety with prejudice and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court-ordered briefing schedule (ECF No. 31), entered February 3, 2020, Plaintiffs' memorandum of law in opposition, if any, must be served on the undersigned counsel by June 22, 2020.

Dated: New York, New York  
May 8, 2020

Respectfully submitted,

By: /s/ Michael B. Carlinsky  
Michael B. Carlinsky  
Xiao Liu  
Jacob J. Waldman  
**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
michaelcarlinsky@quinnemanuel.com  
xiaoliu@quinnemanuel.com  
jacobwaldman@quinnemanuel.com

*Attorneys for Defendants UP Fintech Holding  
Limited*

By: /s/ Susannah S. Geltman  
Susannah S. Geltman  
Anthony C. Piccirillo  
**SIMPSON THACHER &  
BARTLETT LLP**  
425 Lexington Avenue  
New York, NY 10017  
Telephone: (212) 455-2000  
sgeltman@stblaw.com  
anthony.piccirillo@stblaw.com

*Attorneys for Defendants Citigroup Global  
Markets Inc. and Deutsche Bank Securities  
Inc.*